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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:
Denis Melic,
Debtor

Case No. 20-40274-elm
Chapter 13

**RESPONSE TO TRUSTEE’S NOTICE OF INTENT TO CERTIFY CHAPTER 13 CASE
FOR DISMISSAL IN FOURTEEN DAYS FOR PLAN PAYMENT DELINQUENCY**

TO THE HONORABLE MARK X. MULLIN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Denis Melic (“Debtor”), and files this *Response to Trustee’s Notice of Intent to Certify Chapter 13 Case for Dismissal* (“Notice”) (Doc. 107), and would respectfully show the Court as follows:

1. Due to increase costs and the inability to hire additional drivers, the Debtor’s trucking business income has declined sharply over the past six months. According to the Trustee’s Notice, the amount to bring all payments current is \$9,915.00.
2. Debtor intends to amend schedules I and J to reflect his lower income and increased costs and file a Notice of Conversion to Chapter 7.
3. Post conversion, the Debtor intends to promptly cure and maintain payments to his secured creditors.

WHEREFORE, PREMISES CONSIDERED, Debtor asks the Court to deny the relief requested in *Notice of Intent to Certify Chapter 13 Case for Dismissal* filed by Pam Bassel. Debtors ask for general relief.

Date: December 6, 2022

Respectfully submitted,

Norred Law, PLLC

By: /s/ Clayton L. Everett
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the foregoing via first class mail, proper postage affixed or via ECF upon all those requesting notice pursuant to Local Bankruptcy Rule 2002-1(j).

/s/ Clayton L. Everett